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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY CARTER and
ISAAH ROWLAND,

Defendant.

CASE NO. 2:24-CR-00242-DAD

STIPULATIONS REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: November 12, 2024
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 12, 2024.
2. By this stipulation, defendants now move to continue the status conference until January 6, 2025, and to exclude time between November 12, 2024, and January 6, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes investigative reports and related documents in electronic form includes over 500 pages of documents, numerous photographs, and multiple video recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1 b) Counsel for defendants desire additional time to consult with their clients, review
2 the current charges, conduct investigation and research related to the charge, review and copy
3 discovery for this matter, discuss potential resolutions with their clients, and otherwise prepare
4 for trial.

5 c) Counsel for defendants believe that failure to grant the above-requested
6 continuance would deny them the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of November 12, 2024 to January 6,
14 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendants' request on the basis
16 of the Court's finding that the ends of justice served by taking such action outweigh the best
17 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 5, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ ZULKAR KHAN
ZULKAR KHAN
Assistant United States Attorney

Dated: November 5, 2024

/s/ MIA CRAGER
MIA CRAGER
Counsel for Defendant
ANTHONY CARTER

Dated: November 5, 2024

/s/ DANICA MAZENKO
DANICA MAZENKO
Counsel for Defendant
ISAIAH ROWLAND

ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for November 12, 2024 is continued until January 6, 2025, at 9:30 a.m. and time is excluded between November 12, 2024, and January 6, 2025, under Local Code T4.

IT IS SO ORDERED.

Dated: November 5, 2024

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE

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